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COUNTY DEPARTMENT OF REGIONAL PLANNING

12  
13 **UNITED STATES DISTRICT COURT**  
14 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**  
15

16 CLINTON BROWN,

17 Plaintiff,

18 v.

19 CLARK R. TAYLOR, AICP, THE  
20 LOS ANGELES COUNTY  
DEPARTMENT OF REGIONAL  
PLANNING,

21 Defendants.  
22

Case No. 2:22-cv-09203-MEMF-KS

**DECLARATION OF JONATHAN  
FANG, ESQ. IN SUPPORT OF  
DEFENDANT'S MOTION FOR  
SUMMARY JUDGMENT**

*Filed concurrently with DEFENDANT'S  
MOTION FOR SUMMARY JUDGMENT*

Judge: Hon. Karen L. Stevenson

Date: November 15, 2023

Time: 10:00 a.m.

Crtrm.: 580

Assigned to:  
Hon. Maame Ewusi-Mensah Frimpong  
Courtroom "8B"

Magistrate Judge Karen L. Stevenson  
Courtroom "580"

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1 I, Jonathan Fang, declare as follows:

2 1. I am an attorney duly licensed to practice before this Court and am an associate  
3 with Hurrell Cantrall LLP, attorneys of record for Defendant Clark R. Taylor. AICP. The Los  
4 Angeles County Department of Regional Planning herein. The facts set forth herein are of my  
5 own personal knowledge and if sworn I could and would testify competently thereto.

6 2. On October 10, 2023, an in-person conference pursuant to L.R. 7-3 was held at  
7 Defense counsel's office between Plaintiff Clinton Brown, his assistant Erick Ordaz, and myself  
8 regarding Defendant's Motion for Summary Judgment.

9 3. Plaintiff's serial motion and filings continue to be vexatious and frivolous and  
10 create an unnecessary burden on the time and resource of Defendant. Plaintiff has also continued  
11 to refusal to participate in the discovery process and refuses to provide any documents related to  
12 his claim. Defendant was forced to gather evidence in support of their Motion for Summary  
13 Judgment through additional time-consuming methods and searches.

14 I declare under penalty of perjury under the laws of the State of California that the  
15 foregoing is true and correct.

16 Executed on October 18, 2023, at Los Angeles, California.

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18 *Jonathan Fang*

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Jonathan Fang  
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